

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND

CHRIS BRUSZNICKI, et al.

Plaintiffs

v.

PRINCE GEORGE'S COUNTY, et al.

Defendants.

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Case No.

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NOTICE OF REMOVAL

TO THE CLERK OF THE ABOVE ENTITLED COURT:

PLEASE TAKE NOTICE that Defendant Prince George's County Department of the Environment removes the state court action described below to this Court.

1. On August 29, 2019, an action was filed in the Circuit Court for Prince George's County, captioned *Brusznicki v. County*, case number, CAE19-15731.
2. This civil action may be removed from the circuit court to this Court pursuant to 28 U.S.C § 1441(a) because this Court has original jurisdiction pursuant to 28. U.S.C. § 1331, as Plaintiff alleges that Section 14-817 of the Tax-Property Article of the Maryland Annotated Code violates the Privileges and Immunities Clause of the Fourteenth Amendment. *See* Compl. Counts I and III.
3. The complaint and summons were delivered to Defendant on November 1, 2019.
4. Defendant has attached to this Notice a copy of all "process, pleadings, documents and orders which have been served" upon it pursuant to Local Rule 103.5(a).
5. It appears that Plaintiffs served the State of Maryland to only provide notice of the

constitutionality challenge to the statute. *See* Compl. ¶¶ 2-5 (excluding the State as a party). Nevertheless, Defendant County on December 2, 2019 obtained the State's consent to this removal action.

**WHEREFORE**, Defendant prays that:

A. This action be removed to the United States District Court for the District of Maryland; and

B. The Circuit Court for Prince George's County, Maryland shall proceed no further in this case unless and until it is remanded.

Respectfully submitted,

/s/

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*Attorney for Defendants*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on December 2, 2019, a copy of the foregoing Notice of Removal was forwarded, postage prepaid, via first class mail, to:

Geoffrey Polk, Attorney at Law  
939 W. North Ave. Ste 830  
Chicago, IL 60642  
*Counsel for Plaintiffs*

STATE OF MARYLAND  
c/o Brian E. Frosh  
Maryland State Attorney General  
200 St. Paul Place  
Baltimore, MD 21202

\_\_\_\_\_/s/  
Russell A. King, Jr.